

RCRA Compliance Evaluation Inspection

Crystal, Inc.

601 W. 8th Street
Lansdale, PA 19446

County: Montgomery

EPA ID No. PAD002277978

SIC Code: 2899, 2841

Date of Inspection: June 11, 2008

EPA Representatives:

Stacie L. Peterson, Environmental Engineer
RCRA Compliance & Enforcement Branch
Waste & Chemical Management Division
(215) 814-5173

Arlín Galarza-Hernández, Environmental Scientist
Oil and Prevention Branch
Hazardous Site Cleanup Division
(215) 814-3223

State Representatives:

Robert Bauer
Joy Gillespie
Stephen Hilbert
Thomas Magge
Steve Piller
Pennsylvania Department of Environmental Protection
Southeast Regional Office

Facility Representatives:

John Dinunzi, Director of Engineering
(610) 746-1626



Stacie Peterson, Environmental Engineer
Waste & Chemicals Management Division
June 19, 2008

Introduction

On June 11, 2008, the United States Environmental Protection Agency, Region III (EPA), Waste & Chemicals Management Division, RCRA Compliance & Enforcement Branch conducted an unannounced Compliance Evaluation Inspection ("CEI") under the Resource Conservation & Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Crystal, Inc. ("Crystal" or "Facility"). USEPA representatives, Ms. Stacie Peterson and Mrs. Arlín Galarza-Hernández, were accompanied by Mr. Robert Bauer, Ms. Joy Gillespie, Mr. Stephen Hilbert, Mr. Thomas Magge, and Mr. Steve Piller from the Pennsylvania Department of Environmental Protection ("PADEP"). Mrs. Galarza-Hernández performed a Spill Prevention, Control and Countermeasure (SPCC) inspection, in which the observations are not included in this report. The Facility was primarily represented by Mr. John Dinunzi, Director of Engineering.

The inspection team arrived at the Facility at approximately 10:30 am. Upon arrival to the Facility, the inspectors were escorted to a conference room where they were introduced to Mr. Dinunzi. The inspectors identified themselves, and Ms. Peterson explained the purpose of the RCRA Subtitle C inspection to be conducted at the Facility. Ms. Peterson presented her credentials to Mr. Dinunzi before beginning the inspection. The inspection included an evaluation of the Facility's operations, the handling/management of the waste streams generated during these operations, and the Facility's compliance with Federal and State hazardous waste regulations.

All information included in this report are the results of statements made by the Facility representatives, materials shown to the inspectors by the Facility representatives during the inspection, information and documents provided by the Facility representatives to the EPA during the inspection, and a review of the Facility's EPA and State records.

General Facility Information

Crystal is a subsidiary of PMC Group. PMC Group has three facilities within the US and other international facilities. The three facilities in the US are located in Stockerton, Pennsylvania; Memphis, Tennessee; and Waverly, Nebraska. Corporate headquarters are located in Mount Laurel, New Jersey. Crystal has been in operation since the mid-1950s, however, it has only been a part of PMC Group since 1996. Crystal has 40 employees, and the Facility operates 24 hours a day/5-7 (typically 6) days per week.

Crystal is a manufacturer of performance chemicals. The Facility's raw materials include waxes, fatty acids, oils and stearates (animal fats). These materials are blended together through a batch process. Products include base emulsions for personal products (such as lipsticks, chapsticks, and deodorants), soaps, waxes, and cable fill, which is a wax derivative.

Waste Generation

Based on a review of the Facility's manifests for 2006-2008, Crystal appears to be a Conditionally Exempt Small Quantity Generator ("CESQG").

Hazardous waste generated at Crystal is primarily lab waste, which includes cobalt cyanides and mercury, mostly from broken thermometers.

Universal Waste:

- Used Lamps - The Facility utilizes fluorescent lamps throughout the Facility. All used lamps are thrown in the municipal trash.
- Computers/Electronics - Mr. Dinunzi was unsure what is done with used computers/electronics.
- Batteries - All used forklift batteries are managed by a contract service that comes to the Facility and replaces the old battery with a new battery.

Miscellaneous:

- Used Oil - Used oil is generated within the maintenance shop and throughout the process buildings. All used oil is stored outside the maintenance shop and is managed by a waste oil recovery facility. Mr. Dinunzi was unsure of the name of the facility.
- USTs - There is one empty UST at the Facility that was intended for fuel oil prior to the installation of an aboveground storage tank (AST).

Inspection Observations

The tour of the Facility began at approximately 11:00 am.

At the northwest corner of the Facility, near the mobile railcar area, a small pile of rocks with a oily material throughout the pile was observed (See Photos 1 and 2). It was not determined if the material went through the rocks onto the soil. The residue had a strong undetermined foul odor. According to Mr. Dinunzi, this material appeared to be mineral oil.

Within the maintenance shop, Facility representatives stated that used oil generated within the shop is stored outside the shop. At the time of the inspection, no used oil was being accumulated outside the shop area. Facility representatives within the maintenance shop further stated that aerosol can products, such as brake cleaner, are used within the shop. When these cans are considered "empty" by the Facility, they are thrown into the municipal trash.

Near the maintenance shop, a number of boxes of new fluorescent lamps were observed (See Photo 3). According to Facility representatives, all used lamps are thrown into the municipal trash. Some of the boxes of new bulbs contained green tip lamps, while others contained silver tip lamps. Manufacturer information on the various nongreen tipped lamps included Sylvania Ecologic - Cool White (F34CW/SS/ECO), GE-Ecolux (F25T8-SP30-ECO SP30 25 Watts), Sylvania Supersaver Cool White (F96T12/CW/SS E1q5 60 Watts), and GE Watt-Miser - Cool White 800 (F96T12-CW-HO-WM).

The Facility's laboratory was observed during the inspection. Ms. Sohini Patel, lab coordinator, explained that incoming product, in-process, and final approval testing is performed within the lab. Hazardous wastes generated in the lab include vial of cobalt cyanides and mercury, primarily from broken thermometers. Used vials, which were said to contain cobalt cyanide, were observed in a cabinet within the lab. These vials are placed into a 5-gallon

container located within another cabinet. The container was closed and unlabeled. Near the 5-gallon container, another small container, which was open, was observed. This container was said to contain the mercury waste. According to Ms. Patel, these wastes are picked up by EZ Cod Recycling. Approximately every 4-6 months these containers become full, and Ms. Patel contacts the recycling service for pickup.

Records Review

Hazardous waste invoices and manifests and invoices for 2006-2008 were observed. Offsite shipments of hazardous waste occurred in March 2008, June 2007, and October 2006. Information obtained from these waste invoices and manifests is included in Table 1.

Table 1. Hazardous Waste Invoices and Manifests for 2006-2008

Documentation	Date	Waste Description	Disposal Facility
Invoice	3/10/08	Lab pack	Clean Harbors
Invoice	10/27/06	Waste oil (600 lbs); Paint waste (400 lbs); Flammable liquids (400 lbs)	KJ Grace
Invoice & Manifest* (000603844 JJK)	6/12/07	Caustic Solids (2100 lbs); Mixed oil (130 gallons); Lab pack	EQ Detroit
Invoice & LDR & Manifest* (000553599 JJK)	6/12/07	Waste oxidizing solid (20 lbs); Waste mercury compounds (130 lbs); Waste zinc arsenate (8 lbs); Waste phosphoric acid (40 lbs); Hazardous liquid (56 lbs)	Cycle Chem

*Both of these manifests were attached to the same invoice for Environmental Waste Minimization (dated 6/22/07). 000603844 JJK manifest was not signed by the Treatment, Storage, and Disposal Facility (TSDF).

Photos



Photo 1. Pile of rocks near mobile car area. Not the oily material throughout the pile of rocks.



Photo 2. Closeup of Photo 1.

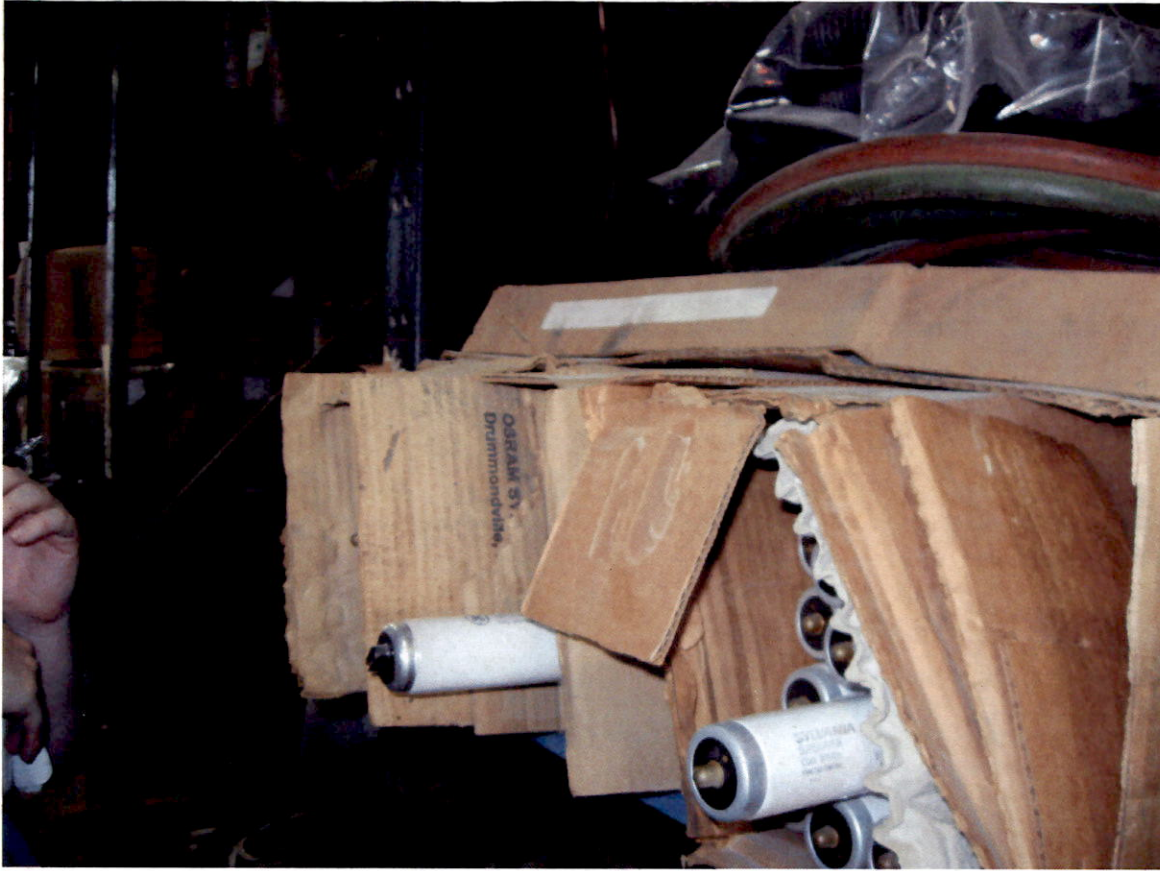


Photo 3. Open boxes of new fluorescent lamps.

Tiered 8/21/08

* Talk w/ Carol about
referring to State.

ENFORCEMENT PRIORITY SCREENING CHECKLIST
ENFORCEMENT SENSITIVE - DO NOT RELEASE

Name and Location of Violator:

Program Contact: Jeanna Henry

Crystal, Inc.

601 West 8th Street

Lansdale, PA 19446

ORC Contact: _____

EPA ID #: PAD002277978

Industry SIC Code: 2899,2841

of Employees: _____

Date of Inspections: June 11, 2008

Annual Income: _____

Recommended Action: NOV

EJ Area: _____

Projected Quarter: _____

Children's Health Issue: _____

SCREENING QUESTIONS

1. What is the violation(s)? Were there violations of reporting requirements such as manifest, DMRs, lab reports or training? Did the violation(s) deprive EPA or any state or local environmental agency of information critical to its program operation or otherwise undermine the regulatory scheme? Please Describe:

1A. 40 C.F.R. § 262.11 – Failure to Make a Waste Determination. Facility failed to make a waste determination for its used lamp and used aerosol can waste streams.

2. Could or did the violation cause or contribute to actual harm to public health or the environment? Is the violation continuing?

Yes, failing to make a waste determination could result in harm to public health or the environment. It is unknown if violations are continuing.

3. Is this a repeat or recurring violation or violator? Is there a history of non-compliance? Please Describe:

No

4. Is this a significant/high priority violation according to the program's guidance? Yes

5. Are there known or suspected violations of other regulatory requirements? Does this case have multi-media potential? No

6. Have there been any State enforcement actions taken for the violation(s)? No
7. Has the company or any individuals employed by the company submitted false or misleading information or documents? Has there been any tampering with monitoring equipment? No
8. Does the violation involve knowing, willful or negligent conduct by the company or any individual employed by the company? Is there evidence that the violator was, or should have been, aware of the requirement(s) which were violated? Please describe: No
9. Is it known whether the violator has received compliance assistance and has failed to correct the violation in a timely manner? Please describe: No
10. Is it suspected that the violator may have obtained an economic benefit or an unfair competitive advantage in its industry from its noncompliance? No
11. Should an enforcement action proceed to the penalty stage, are there any known SEP proposals that might be brought to the violator's attention? No
12. Did the violation occur in a Community Based, Sector Based or Regional Strategic Planning Priority Area as reflected in the current Enforcement MOA or elsewhere? No

Enforcement Options:

No Action
Warning Letter
NOV/NON
State Lead
NOD

AO
APO
Judicial Referral
Criminal Referral

RCRA Compliance Evaluation Inspection

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**ENFORCEMENT PRIORITY SCREENING CHECKLIST
ENFORCEMENT SENSITIVE - DO NOT RELEASE**

Name and Location of Violator: <u>Crystal, Inc.</u> <u>601 West 8th Street</u> <u>Lansdale, PA 19446</u>	Program Contact: <u>Jeanna Henry</u> ORC Contact: _____ EPA ID #: <u>PAD002277978</u>
Industry SIC Code: <u>2899.2841</u> Date of Inspections: <u>June 11, 2008</u>	# of Employees: _____ Annual Income: _____
Recommended Action: <u>NOV</u>	EJ Area: _____
Projected Quarter: _____	Children's Health Issue: _____

SCREENING QUESTIONS
<p>1. What is the violation(s)? Were there violations of reporting requirements such as manifest, DMRs, lab reports or training? Did the violation(s) deprive EPA or any state or local environmental agency of information critical to its program operation or otherwise undermine the regulatory scheme? Please Describe:</p> <p>1A. 40 C.F.R. § 262.11 – Failure to Make a Waste Determination. Facility failed to make a waste determination for its used lamp and used aerosol can waste streams.</p>
<p>2. Could or did the violation cause or contribute to actual harm to public health or the environment? Is the violation continuing?</p> <p>Yes, failing to make a waste determination could result in harm to public health or the environment. It is unknown if violations are continuing.</p>
<p>3. Is this a repeat or recurring violation or violator? Is there a history of non-compliance? Please Describe:</p> <p>No</p>
<p>4. Is this a significant/high priority violation according to the program's guidance? Yes</p>
<p>5. Are there known or suspected violations of other regulatory requirements? Does this case have multi-media potential? No</p>

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Enforcement Options:

No Action
Warning Letter
NOV/NON
State Lead
NOD

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Judicial Referral
Criminal Referral

Crystal Inc.
601 W. 8th Street
Lansdale, PA 19446
Montgomery County

Date of Inspection: 6/11/08

EPA ID # PAD002277978

Inspection Report Review: 7/28/08

- CESQ (?) - appears to be based on manifests.
- Used Lamps - disposed in regular trash (Photo 3)
- * viol 262.11 - Failure to make a waste deter.
- Near mobile railcar area, obs. oily material throughout a small pile of rocks (Photos 1 + 2). Facility rep. believed oily material to be mineral oil.
- Aerosol can products, such as brake cleaner, used in maintenance shop are disposed in regular trash.
- * viol 262.11 - Failure to make a waste deter.
- 5-gal container of used vials containing cobalt cyanide waste located in lab cabinet. The container was closed and unlabeled. A second container (< 5-gal) was observed in same cabinet containing mercury waste (i.e. broken thermometers). Takes approx. 4-6 months to fill these containers.

Enforcement Recommendation:

Notice of Violation

- * fill out ICDS Form
- fill out RCRA Info. Forms



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Bill Rarick, Chief
Hazardous Waste Management Division
Compliance & Information Management Section
Department of Environmental Protection
P.O. Box 8763
Harrisburg, PA 17105-8763

JUN 10 2009

RE: RCRA Notice of Violation (NOV)

Dear Mr. Rarick:

The U.S. Environmental Protection Agency Region III is considering the issuance of a Notice of Violation to Crystal, Inc. (EPA ID No. PAD002277978) located in Lansdale, Pennsylvania pursuant to the Resource Conservation and Recovery Act ("RCRA") as amended by the Hazardous and Solid Waste Amendments ("HSWA") of 1984. The NOV will address violations of RCRA Subtitle C.

I appreciate your cooperation in this matter and look forward to your continued effort toward a successful enforcement program. Should you have any questions regarding this matter, please contact me at (215) 814-5430 or Jeanna R. Henry at (215) 814-2820.

Sincerely,

A handwritten signature in cursive script that reads "Carol Amend".

Carol Amend, Associate Director
Land & Chemicals Division
Office of Land Enforcement

cc: J. Henry (3LC70) ✓



Mr. Bill Rarick, Chief
Hazardous Waste Management Division
Compliance & Information Management Section
Department of Environmental Protection
P.O. Box 8763
Harrisburg, PA 17105-8763

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Sincerely,

Carol Amend, Associate Director
Land & Chemicals Division
Office of Land Enforcement

cc: J. Henry (3LC70)

CONCURRENCES								
SYMBOL	▶	3LC70	3LC70					
SURNAME	▶	J. Henry	K. 210 B					
DATE	▶	6/9/09	6/10/09					
EPA Form 1320-1 (12-70)				OFFICIAL FILE COPY				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUN 24 2009

FEDERAL EXPRESS

Mr. John Dinunzi
Crystal, Inc.
601 W. 8th Street
Lansdale, PA 19446

Re: Notice of Violation
Compliance Evaluation Inspection
June 11, 2008
EPA ID No. PAD002277978

Docket No.: R3-09-NOV-RCRA-31

Dear Mr. Dinunzi:

On June 11, 2008, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") of Crystal, Inc. ("Facility") located in Lansdale, Pennsylvania under the federally authorized Commonwealth of Pennsylvania Hazardous Waste Regulations ("PaHWR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. Based on the CEI, EPA has determined that Crystal, Inc. has violated regulations under PaHWR and RCRA. As a result of this determination, EPA is issuing this Notice of Violation ("NOV"). The specific violation(s) are:

1. During inspection of the Maintenance Shop, the inspectors observed aerosol can products, such as brake cleaner. Based on discussions with Facility representatives, used aerosol cans are disposed of in the regular municipal trash. The propellants and/or products typically used in aerosol cans are characteristic for ignitability. Therefore, used aerosol cans that are going for disposal may be regulated as a RCRA hazardous waste. Please find enclosed with this NOV an EPA guidance document which discusses the regulatory status of used aerosol cans under RCRA. By failing to make a waste determination for the Facility's used aerosol can waste stream, Crystal, Inc. violated PaHWR 25 Pa Code § 262a.10, which incorporates by reference 40 C.F.R. § 262.11.

40 C.F.R. § 262.11 states:

"A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

(a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.

(b) He must then determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.



(c) For purposes of compliance with 40 CFR part 268, or if the waste is not listed in subpart D of 40 CFR part 261, the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either:

- (1) Testing the waste according to the methods set forth in subpart C of 40 CFR part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or*
- (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or processes used."*

2. The Facility disposes of its used lamp (i.e., fluorescent) waste stream in the regular trash. Under PaHWR 25 Pa Code Chapter 266b, which incorporates by reference 40 CFR part 273, used lamps are regulated as a "universal waste." Examples of common universal waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps. By failing to properly contain, label and dispose of the Facility's used lamp waste stream, Crystal, Inc. violated PaHWR 25 Pa Code § 266b.10, which incorporates by reference 40 C.F.R. §§ 273.13(d)(1), 273.14(e) and 273.18(a).

40 C.F.R. § 273.13(d)(1) states:

"A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions."

40 C.F.R. § 273.14(e) states:

"Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: 'Universal Waste—Lamp(s),' or 'Waste Lamp(s),' or 'Used Lamp(s)'."

40 C.F.R. § 273.18(a) states:

"A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination."

A copy of the CEI inspection report documenting the findings of the inspector is enclosed for your information.

Within twenty (20) calendar days of receipt of this NOV, please submit a response documenting the measures Crystal, Inc. has taken or is taking to achieve compliance with the violations noted above or provide an explanation of facts and circumstances that cause you to believe that EPA's determination of the alleged violations are in error. If the compliance measures identified are planned or are ongoing, please provide a schedule for when the compliance measures will be completed. Section 3008(a) of RCRA authorizes EPA to take an

enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$37,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this NOV may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

With regard to the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"), please see the "Information for Small Businesses" memo, enclosed, which might be applicable to your company. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action. EPA has not made a determination as to whether or not you [or your company] are covered by the SBREFA.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. Your response to this NOV shall be addressed to:

Jeanna R. Henry (3LC70)
U.S. Environmental Protection Agency - Region III
Office of Land Enforcement
1650 Arch Street
Philadelphia, Pennsylvania 19103

If you have any questions regarding this matter, please feel free to contact Ms. Henry, Enforcement Officer, at (215) 814-2820.



Carol Amend
Associate Director
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Date *June 23, 2009*

Enclosures

cc: J. Henry (3LC70)
B. Rarick (PADEP)



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B. Rarick (PADEP)

CONCURRENCES							
SYMBOL	▶	3LC70	3LC70				
SURNAME	▶	J. Henry <i>[Signature]</i>	K. Cox <i>[Signature]</i>				
DATE	▶	6/22/09	6/22/09				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Notice of Violation
Crystal, Inc.
Lansdale, PA 19446

June 22, 2009

FROM: Jeanna R. Henry, Environmental Scientist
Land & Chemicals Division/Office of Land Enforcement (3LC70)

TO: Carol Amend, Associate Director
Land & Chemicals Division/Office of Land Enforcement (3LC70)

I recommend that you sign the attached Notice of Violation which addresses violations of the federally authorized Commonwealth of Pennsylvania Hazardous Waste Regulations ("PaHWR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. by Crystal, Inc. of Lansdale, PA.

A. Respondent

Crystal, Inc.
PAD002277978

B. Type of Action

The recommended action is an administrative proceeding for issuance of a Notice of Violation for RCRA Subtitle C violations.

C. Summary of the Case

- Failure to make a waste determination for Facility's used aerosol can waste stream. Used aerosol cans were being disposed in the regular trash.
- Improperly managing and disposing of used lamps.

D. State or City Involvement

Five Pennsylvania Department of Environmental Protection (PADEP) inspectors accompanied the EPA inspector to the Facility for the June 11, 2008 Compliance Evaluation Inspection. The State's regional Operations Manager was also notified prior to the issuance of the enforcement action.

E. Respondent's RCRA History

Prior to EPA's 6/11/2008 CEI, the Facility was inspected by the State on 4/23/2002. Subsequent to EPA's 6/11/2008 CEI, the Facility was inspected on 8/12/08 and 9/2/2008

by the State. No enforcement actions have been issued within the past 5 years.

F. EPA Policy Impact

This case is consistent with EPA policy.

G. Public and Congressional Relations

No public or congressional concern is expected in response to this action.

From: Origin ID: PSQA (215) 814-2081
Lillian Andrelczyk
EPA
1650 Arch Street - 10th Floor
3LC50
Philadelphia, PA 19103



Ship Date: 24JUN09
ActWgt: 1.0 LB
CAD: 7961297/NET9060
Account#: S *****

Delivery Address Bar Code



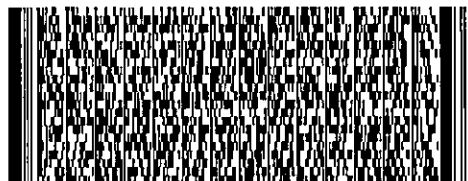
Ref # Jeanna Henry 215 814-2820
Invoice #
PO #
Dept #

SHIP TO: (000) 000-0000

BILL SENDER

Mr. John Dinunzi
Crystal, Inc.
601 W 8TH ST

LANSDALE, PA 19446



TRK# 7977 0949 8351
0201

THU - 25JUN A2
PRIORITY OVERNIGHT
DSR

17 SEGA

19446
PA-US
PHL



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
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ROUTING AND TRANSMITTAL SLIP

Date

6/22/09

TO: (Name, office symbol, room number,
building, Agency/ Post)

Initials

Date

1. J. Horney

[Signature]

6/22/09

2. K. Cox

[Signature]

6/22/09

3. C. Amend

[Signature]

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Notice of Violation for
Crystal, Inc.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions

FROM: (Name, org. symbol, Agency/ Post)

Room No. — Bldg.

Phone No.



Crystal Inc
601 W. 8th Street
Lansdale, PA 19446

Rec'd 7/15/09

Jeanna R. Henry (3LC70)
U.S. Environmental Protection Agency – Region III
Office of Land Enforcement
1650 Arch Street
Philadelphia, PA. 19103

Re: Notice of Violation

Docket No.: R3-09-NOV-RCRA-31

Compliance Evaluation Inspection

June 11, 2008

EPA ID No. PAD002277978

Violation #1: Inspectors observed aerosol can products are disposed of in the regular municipal trash.

Effective approximately six (6) months ago, Crystal recycles all of its aerosol cans in a metal recycle bin at Crystal. Attached to the violation sent to Crystal is a letter from the EPA to the Steel Recycling Institute that specifically addressed the regulatory status of aerosol cans. In its findings, it states "aerosol cans that do not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)) and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(ii) if it were to be recycled".

To this end, aerosol cans that have liquid remaining in them after propellant has expired are punctured so that most of the remaining liquid in the can is drained and handled as part of our liquid hazardous waste stream.

Violation #2: The facility disposes of its used lamp (i.e., fluorescent) waste stream in the regular trash.

Effective 6/26/09, Crystal recycles all of its used fluorescent lamps to an approved Universal Waste Facility. The facility is EPSI Earth Protection Services located at 102 Twenty Nine Court, Williamston, S.C. The cardboard "half pack" in use holds 70 – T8 lamps or 36 – T12 lamps. We simply pack the unit with used lamps, seal it according to instructions, and ship it off to EPSI in the prepaid FedEx "Half Pak". Upon receipt we will obtain a Certificate of Recycling.

We thank in advance for your favorable review of these two violations and should you have any questions or concerns, don't hesitate in contacting me directly.

A handwritten signature in blue ink, appearing to read "John Dinunzi".

John Dinunzi
Plant Manager
610.368.1661

cc: William Hood, General Manager, Crystal Inc.

FY 2004 EPA MANUAL INSPECTION CONCLUSION DATA SHEET (ICDS) FORM
Instructions and Definitions for Completing the Information Follow

1. Region: 3 Facility Name/Location Crystal, Inc. / Lansdale PA
2. General Facility Permit ID number: PAD0002277978
3. SIC (4-digit) ☒ 2 ☒ 8 ☒ 4 ☒ 1 or NAICS Code (5-digit): ☐ ☐ ☐ ☐ ☐
4. Date of Inspection: 06/11/2008 (mm/dd/yyyy)
5. Media Type: CAA-Stationary ☐ CWA-NPDES ☐ GLP ☐ Lead Paint ☐ CAA 112r ☐
CAA-Mobile Sources ☐ RCRA ☒ UST ☐ TSCA core, PCBs, asbestos ☐
6. Deficiencies: Did you observe deficiencies during inspection? ☒ Yes ☐ No [N/A is not allowed]
a. If YES, go to #7
b. If NO, go to #9
7. If YES: Did you communicate the deficiencies to the facility during the inspection? ☒ Yes ☐ No
8. Actions Taken: Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated? ☐ Yes ☒ No [N/A is not allowed]
a. If NO, go to #9
b. If YES, check the action(s) taken, or describe any other actions taken. (Check all that apply)
- Action taken**
- ☐ Verified compliance with previously issued enforcement action -part or all conditions
- ☐ Corrected record keeping deficiencies
- ☐ Corrected monitoring deficiencies
- ☐ Completed a notification or a report
- ☐ Requested a permit application
- ☐ Implemented new or improved management practices or procedures
- ☐ Improved pollutant identification (e.g., labeling, manifesting, storage, etc.)
- ☐ Reduced pollution (e.g., use reduction, industrial process change, emissions or discharge change, etc.). *Specify the pollutant(s) reduced only if this action is checked.*
- Water: Ammonia ☐ BOD ☐ COD ☐ TSS ☐ O/G ☐ TC ☐ DO ☐ Metals ☐ CN ☐
- Air: NOx ☐ SO2 ☐ PM ☐ VOC ☐ Metals ☐ HAPs ☐ CO ☐
- List other actions observed or other pollutants reduced: _____

9. Assistance: Did you provide general compliance assistance based on national policy? Yes ☒ No ☐
- Did you provide site-specific compliance assistance based on national policy?
☐ Yes ☒ No
- Note: EPA inspectors are not required to provide compliance assistance.*

Optional Information: Describe actions taken or assistance provided to assist the facility.

Facility needs to make hazardous waste determinations for used pump and used aerosol can waste streams. **NOTE**

TO EPA INSPECTORS:

The main purpose of EPA inspections is to determine compliance with environmental regulations and enforcement agreements. Secondary purposes include providing a field presence to create a credible deterrent and providing assistance, when appropriate, to help facilities achieve compliance.

- The ICDS is used to identify observable corrections to deficiencies and compliance assistance activities. ICDS is NOT designed to capture all of the observations, findings, and other data contained in the final inspection report. Deficiencies identified as potential violations, and actions to address deficiencies noted on the ICDS must be included in the final EPA inspection report.
- ICDS information will be used to collect accomplishments of EPA's national inspection efforts, develop inspection outcomes for GPRA, and manage national compliance monitoring resources.
- The information will NOT be used to track individual EPA inspectors' performance.
- The ICDS should only be used for EPA-led inspections, not for state oversight inspections.

Instructions for each question:

1. Region, Facility Name/Location: Enter the Region, and facility name/location (for unpermitted facilities).
2. Permit ID #: If facility has permit, enter the facility permit ID # from Facility Registration System (FRS).
3. SIC/NAICS Codes: Identify the SIC or NAICS code at (<http://www.commerce.gov>), (<http://www.osha.gov/oshstats/sicser.html>), (<http://www.census.gov/epcd/www/naics.html>), by CD-rom (PB98-502024- NTIS (800-553-6847), or OC Inspector Website (<http://intranet.epa.gov/oeca/inspector>)
4. Date of Inspection: Enter the beginning date of the inspection (e.g., 04/10/2004)
5. Media Type: Check the environmental media program inspection being conducted.
6. Deficiencies: Check YES or NO. EPA inspectors should follow the regional policy on when and how to inform facilities of deficiencies. Deficiencies are defined as potential violations. Deficiencies are NOT compliance determinations (further review is needed to determine violations). A list of potential deficiencies is on the ICIS compliance monitoring screen. (<https://caribou.rtpnc.epa.gov/ICIS/>)
7. Communication: Check YES or NO. N/A is not allowed.
8. Actions Taken: Check YES or NO. If Yes, check only action(s) actually observed/seen, or write in a short description of the action in the "Other" section. These are *not* compliance determinations. Check the box to specify the pollutant: *Ammonia* – NH₃-N, ammonia nitrogen, ammonia as N, *BOD*-Biochemical Oxygen Demand, *COD*- Chemical Oxygen Demand, *TC*-Total Coliform, *TSS*- Total Suspended Solids, *SS*, Settleable solids, *O/G*- Oil and Grease, *DO*- Dissolved Oxygen, *NOx*- Nitrogen Oxides, *SO2*- Sulphur Dioxide, *PM*- Particulate Matter, *VOC*- Volatile Organic Compound, *CN*- Cyanide, *HAPs* – Hazardous Air Pollutants, *CO*- Carbon Monoxide, *Metals*- Hexavalent Chromium, Lead, Mercury, etc. Write in other pollutants if not listed. The Case Conclusion Data Sheet Training Booklet [November, 2000] provides additional information on actions taken. The Training Booklet can be obtained by calling the Office of Compliance(202-564-6004).
9. Compliance Assistance: Inspectors are **not** required to provide compliance assistance during inspections. Check YES or NO to the two questions. General compliance assistance involves distributing prepared information on regulatory compliance, P2 or other written materials/websites. Refer to National Policy: Role of the EPA Inspector in Providing Compliance Assistance During Inspections, June, 2003 for more information for examples of site-specific assistance. The policy is available on the EPA website (www.epa.gov), the Inspector Website (<http://intranet.epa.gov/oeca/inspector>), or calling (202-564-2300).

Data Collection Process:

- Inspectors must complete the ICDS *immediately* after the inspection is conducted.
- Inspector should forward completed forms to first-line supervisor or a designated alternate within five (5) days after returning from either a single inspection, or a series of inspections.
- The first-line supervisor or designated alternate must review the ICDS for completeness and accuracy.
- First line supervisors or designated alternates will compile the ICDS information by media program in order to report ICDS results using a consolidated manual reporting form.
- The consolidated manual reporting form must be sent to HQ for mid-year (~April, 2004) & end-of-year reporting (~October, 2004).

RCRAINFO CM&E EVALUATION - VIOLATION FORM

*EPA ID Number		PAD002277978					
Handler Name		Crystal, Inc.					
Street	6001 W. 8th Street						
City	Lansdale	State	PA	Zip Code	19446		
*EVALUATION		<input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).			
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
	CEI	06/11/2008	E	SLP	WM		
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.			06/11/2008	Reclassified SV Date: Only applicable for SNN evaluation type as appropriate.			
Notes:							
Evaluation Indicator Field (Check all that apply) <input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI) Regulation-Specific FCI BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____ Routine/Standardized FCI CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Delete/Update a Violation?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.			
Does this Evaluation have Undetermined Violations?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>					
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
Was this Evaluation completed at a Federal Facility? (RCRA Section 6002)		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, the Federal Facility Section (on reverse side of this form) must be completed. Only applicable to EPA Owned Inspections (Responsible Agency = E) at Federal Facilities					
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input type="checkbox"/> If Yes, fill in information below.							
Seq. No.	Agency	Type	Date Determined (mm/dd/yyyy)	Seq. No.	Agency	Type	Date Determined (mm/dd/yyyy)

*Required Fields

EPA ID Number	Handler Name				
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete Link to Above Evaluation <input checked="" type="checkbox"/>					
Seq. No. <div></div>	Violation Type 262A	Agency E	Determined Date (mm/dd/yyyy) 09/11/2008	Return to Compliance (RTC) Qualifier <div>A RTC Qualifier is required if entering an Actual RTC Date.</div>	Actual RTC Date (mm/dd/yyyy) <div></div>
Notes: no waste determination for used lamps and used aerosol cans.					
LINK CITATIONS TO ABOVE VIOLATION?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below		
Citation Type	Citation	Citation Type	Citation		
FR	40 CFR 262.11				
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete Link to Above Evaluation <input type="checkbox"/>					
Seq. No. <div></div>	Violation Type <div></div>	Agency <div></div>	Determined Date (mm/dd/yyyy) <div></div>	Return to Compliance (RTC) Qualifier <div>A RTC Qualifier is required if entering an Actual RTC Date.</div>	Actual RTC Date (mm/dd/yyyy) <div></div>
Notes:					
LINK CITATIONS TO ABOVE VIOLATION?		YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below		
Citation Type	Citation	Citation Type	Citation		
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete Link to Above Evaluation <input type="checkbox"/>					
Seq. No. <div></div>	Violation Type <div></div>	Agency <div></div>	Determined Date (mm/dd/yyyy) <div></div>	Return to Compliance (RTC) Qualifier <div>A RTC Qualifier is required if entering an Actual RTC Date.</div>	Actual RTC Date (mm/dd/yyyy) <div></div>
Notes:					
LINK CITATIONS TO ABOVE VIOLATION?		YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below		
Citation Type	Citation	Citation Type	Citation		
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete Link to Above Evaluation <input type="checkbox"/>					
Seq. No. <div></div>	Violation Type <div></div>	Agency <div></div>	Determined Date (mm/dd/yyyy) <div></div>	Return to Compliance (RTC) Qualifier <div>A RTC Qualifier is required if entering an Actual RTC Date.</div>	Actual RTC Date (mm/dd/yyyy) <div></div>
Notes:					
LINK CITATIONS TO ABOVE VIOLATION?		YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below		
Citation Type	Citation	Citation Type	Citation		
FEDERAL FACILITY SECTION (Fill out if EPA Owned Inspection at Federal Facility)					
YES <input type="checkbox"/> NO <input type="checkbox"/>	RCRA 6002 inspection performed?				
YES <input type="checkbox"/> NO <input type="checkbox"/>	Site given RCRA 6002 questionnaire?				
YES <input type="checkbox"/> NO <input type="checkbox"/>	Inspector questionnaire completed and mailed?				

Required Fields

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM

(Attach to RCRAinfo CM&E Evaluation - Violation Form, if appropriate)

EPA ID Number		Handler Name			
PA0002277978		Crystal Inc.			
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	273B	E	06/11/2008	D	07/15/2009
Notes: failure to contain used lamps					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	40 CFR 273.13(d)(1)				
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					
Link to Above Evaluation <input type="checkbox"/>					
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	273B	E	06/11/2008	D	07/15/2009
Notes: failure to label used lamps					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	40 CFR 273.14(e)				
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					
Link to Above Evaluation <input type="checkbox"/>					
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	273B	E	06/11/2008	D	07/15/2009
Notes: improper disposal of used lamps					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	40 CFR 273.18(a)				

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM

(Attach to RCRAinfo CM&E Evaluation – Violation Form, if appropriate)

EPA ID Number

Handler Name

VIOLATION

☐ Add☐ Update☐ DeleteLink to Above Evaluation ☐

Seq. No

Violation Type

Agency

Determined Date (mm/dd/yyyy)

Return to Compliance (RTC) Qualifier

Actual RTC Date (mm/dd/yyyy)

A RTC Qualifier is required if entering an Actual RTC Date.

Notes:

LINK CITATIONS TO ABOVE VIOLATION?

YES ☐NO ☐

If Yes, fill in information below

Citation Type

Citation

Citation Type

Citation

VIOLATION

☐ Add☐ Update☐ DeleteLink to Above Evaluation ☐

Seq. No

Violation Type

Agency

Determined Date (mm/dd/yyyy)

Return to Compliance (RTC) Qualifier

Actual RTC Date (mm/dd/yyyy)

A RTC Qualifier is required if entering an Actual RTC Date.

Notes:

LINK CITATIONS TO ABOVE VIOLATION?

YES ☐NO ☐

If Yes, fill in information below

Citation Type

Citation

Citation Type

Citation

VIOLATION

☐ Add☐ Update☐ DeleteLink to Above Evaluation ☐

Seq. No

Violation Type

Agency

Determined Date (mm/dd/yyyy)

Return to Compliance (RTC) Qualifier

Actual RTC Date (mm/dd/yyyy)

A RTC Qualifier is required if entering an Actual RTC Date.

Notes:

LINK CITATIONS TO ABOVE VIOLATION?

YES ☐NO ☐

If Yes, fill in information below

Citation Type

Citation

Citation Type

Citation

RCRAInfo CM&E ENFORCEMENT FORM

EPA ID Number				Handler Name			
PA0002277978				Crystal Inc.			
ENFORCEMENT <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete				You must provide an Enforcement Identifier (also known as a Seq. No.).			
*Identifier	*Enforcement Date (mm/dd/yyyy)	*Activity Location	*Agency	*Type	Sub-organization	Responsible Person	Attorney
	06/24/2009	FA	E	120	LCD	SRH	
Docket Number:				R3-09-NOV-RCRA-31			
Enforcement Notes:							
Is Enforcement Type 380 (Super CA/FO) and part of a Multi-site Consent Agreement/Final Order (CA/FO)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, you must provide the CA/FO Sequence Number below. If you are the lead agency and want to add a Multi-site CAFO, please provide the CA/FO Respondent Name (required) and Notes (as necessary).							
*CA/FO Sequence Number:				*Respondent Name:			
Notes:							
Was there an Appeal? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please fill in this Section				Disposition Status			
*Appeal Initiated Date (mm/dd/yyyy)		*Appeal Resolved Date (mm/dd/yyyy)		*Disposition Status Qualifier		*Disposition Status Date (mm/dd/yyyy)	
Does this Enforcement Action Contain Corrective Action Requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No							
Do you want to link Media? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please fill in Multimedia Section below on page 1 of this form.							
Do you want to Add/Update/Delete a Technical Requirement Milestone? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please fill in Technical Requirement Milestone Section on page 2 of this form.							
*LINK VIOLATIONS TO THE ABOVE ENFORCEMENT ACTION? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please fill in the Section below. Note: You can link RTC'd violations to an enforcement action.							
*Seq. No.	*Agency	*Type	*Date Determined (mm/dd/yyyy)	Already RTC'd	Scheduled RTC Date (mm/dd/yyyy)	RTC Qualifier An RTC Qualifier is required if entering an Actual RTC Date	RTC Actual Date (mm/dd/yyyy)
	E	262A	06/11/2008	<input type="checkbox"/>		D	07/15/2009
	↓	273B	↓	<input checked="" type="checkbox"/>			
	↓	↓	↓	<input checked="" type="checkbox"/>			
				<input checked="" type="checkbox"/>			
				<input type="checkbox"/>			
				<input type="checkbox"/>			
Multimedia Section (Check all that apply)							
<input type="checkbox"/> AIR	<input type="checkbox"/> CRE	<input type="checkbox"/> CRS	<input type="checkbox"/> EPC	<input type="checkbox"/> FIF			
<input type="checkbox"/> MSW	<input type="checkbox"/> ORP	<input type="checkbox"/> PCB	<input type="checkbox"/> RCA	<input type="checkbox"/> SPC			
<input type="checkbox"/> TSC	<input type="checkbox"/> UIC	<input type="checkbox"/> UST	<input type="checkbox"/> WAT	<input type="checkbox"/> WET			

*Required Fields

EPA ID Number	Handler Name

PENALTY SECTION

PENALTY <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Enforcement <input type="checkbox"/>
---	---

*Penalty Type	*Penalty Amount	Penalty Notes
	\$	

PENALTY PAYMENT <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete

Scheduled Date (mm/dd/yyyy)	Scheduled Amount	Paid Date (mm/dd/yyyy)	Paid Amount	Defaulted Date (mm/dd/yyyy)
	\$		\$	

Notes: _____

PENALTY PAYMENT <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete

Scheduled Date (mm/dd/yyyy)	Scheduled Amount	Paid Date (mm/dd/yyyy)	Paid Amount	Defaulted Date (mm/dd/yyyy)

Notes: _____

PENALTY <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Enforcement <input type="checkbox"/>
---	---

*Penalty Type	*Penalty Amount	Penalty Notes
	\$	

PENALTY PAYMENT <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete

Scheduled Date (mm/dd/yyyy)	Scheduled Amount	Paid Date (mm/dd/yyyy)	Paid Amount	Defaulted Date (mm/dd/yyyy)
	\$		\$	

Notes: _____

PENALTY PAYMENT <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete

Scheduled Date (mm/dd/yyyy)	Scheduled Amount	Paid Date (mm/dd/yyyy)	Paid Amount	Defaulted Date (mm/dd/yyyy)
	\$		\$	

Notes: _____

TECHNICAL REQUIREMENT MILESTONE SECTION

(Additional Technical Requirement Milestones can be added using the RCRAInfo CM&E Additional Technical Requirement Milestones Form)

<input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Enforcement <input type="checkbox"/>
--	---

Technical Requirement Number:		
Technical Requirement Description:		
Scheduled Completion Date (mm/dd/yyyy)	Actual Completion Date (mm/dd/yyyy)	Defaulted Date (mm/dd/yyyy)
Notes:		

*Required Fields

United States Environmental Protection Agency
Washington, DC 20460
Notification of Hazardous Waste ActivityPlease refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).**For Official Use Only**

Comments

C
CRECEIVED
PA SECTION

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)C
F

PADD002277978

T/A C
1

MAR 15 1988

09/1 montgomery

I. Name of Installation

CRYSTAL INC.

II. Installation Mailing Address

Street or P.O. Box

C
3

601 WEST 8TH STREET

City or Town

State

ZIP Code

C
4

LANSDALE

PA 19446

III. Location of Installation

Street or Route Number

C
5

SAME

City or Town

State

ZIP Code

C
6**IV. Installation Contact**

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

FICKERT TED TECH.DIR. 215 368 1661

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

HUNTINGTON LAB. INC.

P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)**A. Hazardous Waste Activity****B. Used Oil Fuel Activities**

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace**VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))**

- ☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

C

W

T/A C

1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☒ 4. Toxic
(D000)
XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature



Name and Official Title (type or print)

Ted Fickert Technical Director

Date Signed

3/13/89

FACTS 1118698

2500-FM-LRWM0275 5/99



EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4-23-2002

Time Start _____

Time Finish _____

**HAZARDOUS WASTE INSPECTION REPORT
CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR**

Company name Crystal, Inc. I.D. Number PAD 002277978

Address 601 West 8th St.

County Montgomery Municipality Lansdale ZIP 19446

Name of Inspector Charles Fees

Name & Title of Responsible Official Ted Fichert, General Mgr.

Person Interviewed Tom Enright Telephone (215) 368-1641

Mailing Address (if different from above) _____ -3205

Amount of Hazardous Waste Generated per Month: _____ kg less than 220 lbs

Waste Determination Completed? ☒ Yes ☐ No Waste On-Site Greater Than 1,000 kg. ☐ Yes ☒ No.

Universal Waste: Large Quantity Handler? ☐ Small Quantity Handler? ☐

Universal Waste Types _____

1. Waste Handling Method:

- ☐ On-Site in a treatment, storage or disposal facility permitted under Chapter 270a and incorporated sections of 40 CFR Part 270.
- ☒ Off-Site in a treatment, storage or disposal facility permitted under Chapter 270a and incorporated sections of 40 CFR Part 270 or having interim status under Chapter 265a and incorporated sections of 40 CFR Part 265.
- ☐ On-Site treatment & off-site treatment, storage or disposal in compliance with 40 CFR Section 261.5 and 25 PA Code Section 261a.5.
- ☐ Off-Site in a permitted municipal or industrial facility in another state.
- ☐ Off-Site to a facility which beneficially uses or reuses, or legitimately recycles or reclaims its waste
- ☐ Off-Site to a facility that treats waste prior to beneficial use or reuse, or legitimately recycles or reclaims its waste

2. Hazardous Waste Transportation: Self transportation ☐ yes ☒ no

If no: Transporter Name St. Joseph Motor Line

License Number PA-AH 0390

3. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
		<u>Mid 096 963194</u>
<u>D001, D007</u>	<u>Hazardous Waste Liquid</u> <u>(Cadmium, Chromium)</u>	<u>Perma-Flex of Michigan</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 4-23-2002 Identification Number PAD 002277978
Company/Facility/Site Name Crystal, Inc.

On this date Charlie Fees conducted a hazardous waste generator inspection. Tom Enright granted permission for inspection.

The following observations were made:

1. Crystal is a conditionally exempt generator (CEG) for hazardous waste.
2. At time of inspection, I did not see any hazardous waste in storage.
3. Hazardous waste shipping manifests indicate that Crystal had shipped hazardous waste 4-1-02. This waste was obsolete product, which Crystal needed to dispose of as hazardous waste, due to the presence of chromium and cadmium. General Manager Ted Fichert said that this material is not a regular waste stream.
4. Crystal is a large quantity generator (LQG) of *residual* (non-hazardous) waste. Please see the concurrent residual waste inspection report.

No violations observed.

Ted Fichert reviewed this report and retained a copy.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Ted Fichert

Date

4-25-2002

Inspector (signature) Charlie Fees

Date

4-23-2002



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER



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PAD002277978

INSTALLATION ADDRESS



FICKERT, TED TECH DIR
CRYSTAL INC
601 WEST 8TH ST
LANSDALE PA 19446

601 WEST 8TH ST
LANSDALE PA 19446



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11 Dec 97
Time Start 0930
Time Finish 1115

HAZARDOUS WASTE INSPECTION REPORT CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR

Company name Crystal, Inc I.D. Number PAD002277978
Address 601 West 8th Street
County Montgomery Municipality Lansdale Borough ZIP 19446
Name of Inspector John Mital
Name & Title of Responsible Official Ted Fickert VP/GM
Person Interviewed George Larson Telephone (215) 368-1661
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ kg 25 lbs
Waste Determination Completed? ☒ Yes ☐ No Waste On-Site Greater Than 1,000 kg. ☐ Yes ☒ No.
Universal Waste: Large Quantity Handler? ☐ Small Quantity Handler? ☐
Universal Waste Types _____

1. Waste Handling Method:

- ☐ On-Site in a treatment, storage or disposal facility permitted under Chapter 270.
☐ Off-Site in a treatment, storage or disposal facility permitted under Chapter 270 or having interim status under Chapter 265
☐ On-Site treatment & off-site treatment, storage or disposal in compliance with 261.5(f)(g) or (j).
☒ Off-Site in a permitted municipal or industrial facility in another state.
☐ Off-Site to a facility which beneficially uses or reuses, or legitimately recycles or reclaims its waste
☐ Off-Site to a facility that treats waste prior to beneficial use or reuse, or legitimately recycles or reclaims its waste

2. Hazardous Waste Transportation: Self transportation ☐ yes ☐ no

If no: Transporter Name St Joseph Motor Lines
License Number PA-AH 0390

3. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D018, D019, D004, D007</u>	<u>Arsenic/Lead Solid Waste</u>	<u>Fisher Industrial Service</u>
<u>D002</u>	<u>sodium mercaptobenzoethiol (caustic)</u>	<u>LWD, Inc</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 11 Dec 97Identification Number PAD002277978Company/Facility/Site Name Crystal, Inc

A conditionally exempt small quantity generator inspection was conducted on Thursday, December 11, 1997, by John Metel, Solid Waste Specialist. George Lorenson, Environmental Health + Safety Manager, granted access to the site and was the person interviewed during the inspection.

The following observations were made:

1) Mr. Lorenson stated that Crystal, Inc generates very little hazardous waste. He then went on to say that the hazardous waste generated in October of 1997 was the result of a tank clean-out.

2) The manifests were reviewed for 1995 and 1997. All were complete and accurate. Crystal, Inc did not generate any hazardous waste in 1996.

No Violations Observed. The results of this inspection were reviewed with Mr. Lorenson before leaving the facility. A copy of this report was left at the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 11 Dec 97Inspector (signature) Date 11 Dec 97